REMARKS

Claim 1 stands rejected under 35 U.S.C. 102(e) as being anticipated by Kim et al. (U.S. Patent No. 6,567,144 B1). Applicants traverse the rejection because the cited reference does not disclose (or suggest) a width of an auxiliary protrusion structure that is wider than a width of a protrusion structure.

The present invention is directed to a liquid crystal display that includes first and second substrates having liquid crystal therebetween. A structure is provided on at least the first substrate to control an alignment of the liquid crystal. The structure has a linear protrusion structure, and also an auxiliary protrusion structure extending from the linear protrusion structure and opposing each of the facing end portions of the second electrode. The width of the auxiliary protrusion structure is wider than a width of the linear protrusion structure, as recited in claim 1.

In the Office Action on page 3, item 3, the Examiner asserts that FIGs. 6-8 of Kim show the features of the present invention. More specifically, the Office Action states a structure 17 (171) on a first substrate 100 has a linear protrusion structure 17, and an auxiliary protrusion structure 171 that is wider than a width of the protrusion structure 17, as shown in FIG. 8 of Kim. Applicants respectfully traverse this statement because the drawings of Kim are not to scale, and the dimensions of the auxiliary protrusion structure 171 are not disclosed by Kim.

Proportions of features in a drawing are not evidence of actual proportions when drawings are not to scale. (See MPEP 2125). When a reference does not disclose that

the drawings are to scale and is silent as to dimensions, arguments based on measurements of the drawing features are of little value. (See *Hockerson-Halberstadt, Inc. v. Avia Group Int'l,* 222, F.3d 951, 956, 55 USPQ2d 1487, 1491 Fed. Cir. 2000). Kim teaches that the width of the protrusion 17 is preferably in the range of 35 to -20 μm. (See col. 7, lns. 38-40). However, Kim fails to teach a dimension of the width of the branch 171. Instead, Kim merely states that the width of the branch 171 may gradually decrease from the point connected to the protrusions 17 and 27 to the end of the branch 171. (See col. 7, lns. 44-46). Accordingly, since Kim is silent regarding a width of the branch 171, and the drawings are not drawn to scale, the rejection is improper and should be withdrawn, which is respectfully requested.

Moreover, the drawings themselves support this conclusion. FIGs. 6A and 6B of Kim are layout views showing a two protrusion pattern for forming multi-domains. (See col. 3, lns. 23-24). FIG. 8 is an enlarged view of portion (b) in FIG. 6A. (See col. 3, ln. 28). As can be clearly seen in FIG. 6A, the branch 171 is not wider than the protrusion 17. Therefore, Applicants respectfully submit that FIG. 8 is not an accurate blown-up view of FIG. 6A. For this reason, the drawings should not be relied upon to teach the present invention, and the rejection should be withdrawn.

For all of the foregoing reasons, Applicants submit that this Application is in condition for allowance, which is respectfully requested. The Examiner is invited to contact the undersigned attorney if an interview would expedite prosecution.

Respectfully submitted,

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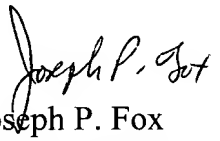
By: 

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